

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Stephanie Jowers,

Plaintiff,

- against -

DME Interactive Holdings, Inc. and Darien Dash,

Defendants.

00 Civ. 4753 (LTS)(KNF)

MEMORANDUM OF LAW IN SUPPORT OF MOTION TO
COMPEL

Rule 30 permits a party to depose any person, including a party, and provides that the attendance of a deponent may be compelled by service of a subpoena under Rule 45. Rule 37(a)(1) provides for a motion to compel discovery.

Plaintiff has complied with Rule 37(a)(1), because plaintiff's attorney has attempted to confer with Mr. Dash to secure his compliance with the subpoena voluntarily.

Accordingly, plaintiff's motion should be granted in its entirety.

Dated: New York, New York
March 13, 2012

MICHAEL G. O'NEILL

A handwritten signature in blue ink, appearing to read 'TW022', is positioned above a horizontal line.

By: Theresa B. Wade (TW0522)
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